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September 26, 2018

Secretary of Transportation

United States Department of Transportation

1200 New Jersey Avenue, SE

Washington, DC 20590

Attn: Blane A. Workie, Assistant General Counsel for Aviation Enforcement
Proceedings

Re: Submission in *NABR v. United Airlines et al.* Docket No. DOT-OST-2018-0124

Dear Madam Secretary:

We are submitting this letter to provide the Department of Transportation (DOT) with information that may be relevant to its evaluation of the above referenced complaint, which alleges that various airlines refuse to carry animals for critical biomedical research, but carry them for other purposes.

The Society of Toxicology (SOT) is a professional and scholarly organization of more than 8,200 scientists from academic institutions, government, and industry representing the great variety of scientists who practice toxicology in the US and abroad. Toxicology is the study of the adverse effects of chemical, physical, or biological agents on living organisms and the ecosystem, including the prevention and amelioration of such adverse effects. The Society's mission is to create a safer and healthier world by advancing the science and increasing the impact of toxicology.

SOT is committed to reduction in the number of animals used for research and testing when scientifically appropriate and valid. Currently, research involving laboratory animals is necessary to ensure and enhance human and animal health and disease prevention. Although significant efforts are being made to replace them, at present, it is not possible to completely eliminate the use of laboratory animals. Research using laboratory animals has led to elucidation of mechanisms by which drugs and other chemicals cause toxic responses as well as approaches for prevention and amelioration of their toxicity. Animal research also provides the basis upon which risk from exposure to drugs and other chemicals is estimated. Such research has contributed to a safer and healthier world.

The humane transport of research animals, conducted in compliance with government regulations and in accordance with strict, accepted standards, is essential for biomedical research to continue to progress. Reliance on expert, licensed animal couriers assures the safe and appropriate handling of these animals. The continued transport of research animals, when undertaken in an expert and responsible manner, is essential.

According to the complaint, many airlines refuse to transport animals for these vital scientific discoveries, although the airlines will transport the same animals for non-research purposes, such as for zoos or as pets. We believe that as long as the government requires this research, it should also enforce its laws in a way that does

not undermine these essential research requirements. This arbitrary delineation by the airlines - which we understand has no transportation related purpose - threatens the progress of key research, research which could reduce or even eradicate diseases.

We urge the DOT to investigate the complaint filed by NABR and to require all airlines to eliminate policies which discriminate against animal carriage and instead base carriage solely on the fact that the purpose of the transportation of animals is for legal, legitimate, necessary and essential life-saving biomedical research. We respectfully request that DOT take these actions to ensure the continued progress of essential medical research.

Sincerely,

A handwritten signature in cursive script that reads "Leigh Ann Burns Naas".

Leigh Ann Burns Naas, PhD, DABT, ATS, ERT
SOT President 2018-2019